

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

FREE SPEECH COALITION, INC., et al.,

Plaintiffs,

v.

ANGELA COLMENERO, In Her Official
Capacity As Interim Attorney General For
The State Of Texas

Defendant.

CASE NO. 1:23-cv-00917-DAE

REBUTTAL DECLARATION OF ALISON BODEN IN SUPPORT OF PLAINTIFFS'
MOTION FOR EXPEDITED PRELIMINARY INJUNCTION

I, Alison Boden, declare as follows:

1. I provide this declaration in support of the Motion for Expedited Preliminary Injunction against enforcement of Act of June 12, 2023, Ch. 676 (H.B. 1181) Tex. Sess. Law Serv. (“the Act”). I am over eighteen years of age, and I have personal knowledge of the matters set forth in this Declaration; if called as a witness I could and would testify competently to these matters.

2. I have reviewed the Defendants’ Opposition and supporting papers. The Opposition refers (Opp. at p. 5) to FSC’s decision not to reveal the identities of the members it most urgently represents in this action. FSC cannot disclose these members, consistent with its ethical obligations, since these anonymous members rely on FSC for their own protection, for the reasons stated in my previous declaration. FSC can disclose that some of these members reside in the US, produce adult content through a variety of mediums, and that some operate adult websites.

3. To the extent an FSC member must be identified by name, Plaintiff Paper Street Media, LLC, which operates the TeamSkeet network, as well MG Freesites, Ltd, which operates Pornhub.com, are members of FSC.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on August 21, 2023, in San Francisco, California.

Dated: August 21, 2023

/s/ Alison Boden
Alison Boden